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By ECF

January 24, 2022

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York and I am among counsel for the defense in the above-referenced matter. I write to respectfully request that the Court grant a one-week extension from January 24, 2022, to January 31, 2022, to respond to the Gray plaintiffs' letter dated January 20, 2022, (Dkt. No. 356). Defendants make this request as defense counsel has been fully engaged in document production issues and deposition scheduling issues with 50 plus depositions that are set to begin the first week of February. Although the issue raised by the Gray plaintiffs is important, it is not acutely time sensitive as these others issues that defendants are currently facing. Defendants have made no previous requests to respond to plaintiffs' letter at Dkt. No. 356.

Plaintiffs do not object to an extension but state:

" On December 9, 2021, the parties reached an initial impasse on this issue during a meet and confer and we wrote to the City on December 10, 2021, confirming the impasse. We were asked to wait until the first week in January to confirm the impasse (and other issues from the meet and confer). The City did not follow up on the impasse and on January 14, 2022, Gray sent a draft letter (that became Docket No. 69) and sent it to the City to see if they would change their position. Only on January 20, 2022 did Gray upload the letter to the docket and submit it to the Court. The City has already has had nearly six weeks to consider the issue (not including all the time it had to make its objection prior to the meet and confer), and ten days to consider the letter. As the high up depositions and Rule 30b6 depositions are scheduled to start very soon, it is imperative that these issues be resolved. In a showing of good faith, we agree to a two day extension."

Thank you for your consideration herein.

Respectfully submitted,

Amy Robinson s/

Amy Robinson
Senior Counsel
Special Federal Litigation Division

cc: ALL COUNSEL (via ECF only)